

**MOSKOWITZ COLSON
GINSBERG SCHULMAN**

Moskowitz Colson
Ginsberg & Schulman LLP
80 Broad Street, Suite 1900
New York, NY 10004
(212) 257-6455
www.mcgsllp.com

July 17, 2023

By ECF

Honorable Paul A. Crotty
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

7/17/2023
*The request is granted and the
restriction is modified as requested*
Paul Crotty
CSOS

Re: *United States v. Franklin Rosario*, 23 Cr. 102 (PAC)

Dear Judge Crotty:

I represent Franklin Rosario in the above-captioned matter. On February 21, 2023, Mr. Rosario pleaded guilty to narcotics conspiracy. He is scheduled to be sentenced on August 9, 2023. He is currently being supervised by Pretrial Services in the District of Rhode Island.

Mr. Rosario is currently employed as a security guard at Brosnan Security. He learned over the weekend that he is expected to begin covering overnight patrol shifts at a construction site in Worcester, MA. **His first shift begins tonight, July 17 at 9:00PM and ends tomorrow morning, July 18 at 6:00AM.** He will be covering two to three overnight shifts per week.

Therefore, I write to respectfully request that Mr. Rosario be permitted to transition to Standalone GPS Monitoring (SAM) in order to accommodate overnight shifts as well as travel to and from Worcester, MA. Enclosed please find a copy of Mr. Rosario's schedule for the remainder of the week. He will provide future schedules to Pretrial Services.

The government, Pretrial Services in the District of Rhode Island, and Pretrial Services in the Southern District of New York have no objection to this request.

I appreciate the Court's consideration.

Respectfully submitted,

/s/

Deborah Colson
(212) 257-6455

